

***Remarks***

Reconsideration of this Application is respectfully requested.

Claims 1-19 are pending in the present application, with claims 1 and 11 being the independent claims. Claims 1-19 have been amended to correct informalities and to clarify the language recited therein. These amendments are believed to introduce no new matter, and their entry is respectfully requested.

In the Office Action dated April 4, 2008, claims 1, 4, 5, 9, and 10 were rejected under 35 U.S.C. §102(b) as being anticipated by Nakano (U.S. Published Application No. 2002/0024645). Applicants respectfully traverse this rejection:

Claim 1 recites a method of maintaining a machine part arranged in an interior space of a machine, where the interior space is kept at a first pressure and is separated from an environment having a second pressure via a load lock. As recited by claim 1, the method includes "transporting the machine part via the load lock out from the interior space; and transporting via the load lock into the interior space, the machine part after being maintained or a separate replacement machine part, wherein the machine part is a substrate table configured to support a substrate or a gripper configured to grip and release the substrate and/or the substrate table." Applicants respectfully submit that Nakano does not disclose, teach, or suggest all of the features of claim 1.

Nakano discloses a load-lock chamber, for loading and unloading reticles and wafers into and out of an exposure apparatus. See Nakano at Abstract. Applicants respectfully submit that one of ordinary skill in the art would not consider a reticle or a wafer to be a "machine part." However, to expedite prosecution, claim 1 has been amended to specify that the machine part recited therein is either a substrate table or a gripper. Nakano does not

disclose, teach, or suggest that either load-lock chamber may be used to transport a substrate table or a gripper from and into the interior space of a machine, as recited by claim 1.

In view of the foregoing, Applicants respectfully submit that claim 1 and the claims that depend from claim 1 and include additional advantageous features, are patentable over Nakano, and respectfully request that the rejection of claims 1, 4, 5, 9, and 10 be withdrawn.

In the Office Action, claims 1-5, and 9-16 were rejected under 35 U.S.C. §102(b) as being anticipated by Verbeke et al. (U.S. Published Application No. 2003/0045131, hereinafter "Verbeke"). Applicants respectfully traverse this rejection.

Claim 1 is discussed above. Applicants respectfully submit that Verbeke does not disclose, teach, or suggest all of the features of claim 1.

Verbeke discloses two single wafer load locks (1206, 1208) that are configured to allow wafers to pass between an atmospheric platform (1202) and a sub-atmospheric platform (1204). See Verbeke at [0126] and FIG. 12. Verbeke does not disclose, teach, or suggest that either load lock may be used to transport a substrate table or a gripper from and into the interior space of a machine, as recited by claim 1.

In view of the foregoing, Applicants respectfully submit that claim 1 and the claims that depend from claim 1 and include additional advantageous features, are patentable over Verbeke, and respectfully requests that the rejection of claims 1-5, 9, and 10 be withdrawn.

Claim 11 recites an assembly that includes "an apparatus within an interior space, where said interior space is kept at a first pressure and is separated from an environment having a second pressure; and a load lock separating said interior space from said environment and constructed and arranged to transfer a machine part out of said interior space and constructed and arranged to receive and transfer said machine part after

maintenance or a separate replacement machine part into said interior space, said machine part being a substrate table configured to support a substrate or a gripper configured to grip and release the substrate and/or the substrate table, said load lock being constructed and arranged to maintain said first pressure when open to said interior space and to maintain said second pressure when open to said one of said machine part after maintenance and a separate replacement machine part, wherein said apparatus and said load lock are constructed and arranged to maintain said interior space at said first pressure when said load lock is open to said second pressure." Applicants respectfully submit that Verbeke does not disclose, teach, or suggest all of the features of claim 11.

As discussed above, Verbeke does not disclose, teach, or suggest that either load lock (1206, 1208) may be used to transport a substrate table or a gripper from and into the interior space of a machine, and thus does not disclose, teach or suggest a load lock arranged to transfer a machine part, wherein the machine part is a substrate table or a gripper, out of or into an interior space of an apparatus as recited by claim 11.

In view of the foregoing, Applicants respectfully submit that claim 11, and the claims that depend from claim 11 and include additional advantageous features, are patentable over Verbeke, and respectfully requests that the rejection of claims 11-16 be withdrawn.

In the Office Action, claims 6-8, and 17-19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nakano in view of Miyai et al. (U.S. Patent No. 5,825,470, hereinafter "Miyai"). Applicants respectfully traverse this rejection.

Claims 6-8, 18, and 19 depend from claim 1, and claim 17 depends from claim 11. Applicants respectfully submit that a prima facie case of obviousness has not been made by the Office Action because one of ordinary skill in the art would not combine the references in

the manner asserted by the Office Action, and even if the two references are combined, the combination does not disclose, teach, or suggest all of the features of claims 1 and 11.

As discussed above, claim 1 and the claims that depend from claim 1 are patentable over Nakano. Miyai does not make up for the deficiencies of Nakano. Miyai discloses two chambers (12, 14) and a Y-guide (90) that is provided between the two chambers (12, 14). See Miyai at col. 10, Ins. 55-56; FIGs. 1 and 2. The Y-guide (90) allows a holder (44) to be transported between the chambers (12, 14). See Miyai at col. 11, lines 3-26; FIGs. 1 and 2. Miyai does not disclose, teach or suggest that the two chambers are held at different pressures. As such, there is no need for a load lock to be provided between the two chambers. Moreover, Nakano does not disclose, teach or suggest that the load lock disclosed therein is or may be configured to receive a substrate table or a gripper. As such, the combination of Nakano and Miyai does not disclose, teach, or suggest all of the features of claim 1.

Moreover, Applicants respectfully submit that the Office Action is impermissibly using hindsight in an attempt to piecemeal references together to come up with the features of Applicants' claims. *See In re Wesslau*, 353 F.2d 238, 241, 147 USPQ 391, 393 (CCPA 1965) ("Such piecemeal reconstruction of the prior art patents in light of appellant's disclosure is contrary to the requirements of 35 U.S.C. § 103") and MPEP §2143.01.

In view of the foregoing, Applicants respectfully submit that claim 1, and the claims that depend from claim 1 and include additional advantageous features, are patentable over Nakano in view of Miyai, and respectfully request that the rejection of claims 6-8, 18, and 19 be withdrawn.

Claim 11 is discussed above. Applicants respectfully submit that claim 11 and the claims that depend from claim 11 are patentable over Nakano in view of Miyai for

substantially the same reasons discussed above with respect to claim 1. Specifically, the combination of Nakano and Miyai does not disclose, teach, or suggest – at least – "a load lock separating said interior space from said environment and constructed and arranged to transfer a machine part out of said interior space and constructed and arranged to receive and transfer said machine part after maintenance or a separate replacement machine part into said interior space, said machine part being a substrate table configured to support a substrate or a gripper configured to grip and release the substrate and/or the substrate table," as recited by claim 11. Moreover, one of ordinary skill in the art would not combine the references in the manner asserted by the Office Action; the Office Action is impermissibly using hindsight in an attempt to piecemeal these references together.

In view of the foregoing, Applicants respectfully submit that claim 11, and the claims that depend from claim 11 and include additional advantageous features, are patentable over Nakano in view of Miyai, and respectfully request that the rejection of claim 17 be withdrawn.

In the Office Action, claims 6-8 and 17-19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Verbeke in view of Miyai. Applicants respectfully traverse this rejection.

As discussed above, claims 6-8, 18, and 19 depend from claim 1, and claim 17 depends from claim 11. Verbeke and Miyai are discussed above. Applicants respectfully submit that the combination of Verbeke and Miyai does not disclose, teach, or suggest all of the features of claims 1 and 11, and there would be no motivation for one of ordinary skill in the art to combine these references in the manner asserted by the Office Action.

Specifically, Miyai does not disclose, teach or suggest that the two chambers are held at different pressures. As such, there is no need for a load lock to be provided between the two chambers. Moreover, Verbeke does not disclose, teach or suggest that the load locks disclosed therein are or may be configured to receive a substrate table or a gripper. As such, the combination of Verbeke and Miyai does not disclose, teach, or suggest all of the features of claim 1 or claim 11. Moreover, Applicants respectfully submit that the Office Action is impermissibly using hindsight in an attempt to piecemeal references together to come up with the features of Applicants' claims. *See In re Wesslau*, 353 F.2d 238, 241, 147 USPQ 391, 393 (CCPA 1965) ("Such piecemeal reconstruction of the prior art patents in light of appellant's disclosure is contrary to the requirements of 35 U.S.C. § 103") and MPEP §2143.01.

In view of the foregoing, Applicants respectfully submit that claim 1 and 11, and the claims that depend from claims 1 and 11 and include additional advantageous features, are patentable over Verbeke in view of Miyai, and respectfully request that the rejection of claims 6-8 and 17-19 be withdrawn.

***Conclusion***

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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